APPENDIX B
Environmental Protection Agency

Facility Response Plan Summary
40 CFR §112.20 and Appendix F

EPA Facility Response Plan Summary

The Oil Pollution Act of 1990 amended Section 311 of the Clean Water Act to incorporate requirements for preparing Facility Response Plans (FRPs) for any non-transportation-related onshore facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines. Specific criteria that trigger the need to develop a FRP are identified in 40 CFR 112.20(f)(1). FRPs developed for applicable FAA facilities must be submitted for review and approval to the appropriate EPA Regional Administrator.

The FRP is intended to provide a formalized response plan that will reduce the likelihood of substantial environmental damage from spills or releases of oil directly to waterways or from operations storing substantial quantities of oil products. The FRP required for non-transportation related facilities meeting established threshold criteria must address the following elements:

EPA FRP Scope

Specific FRP Elements	
• Emergency Action Plan • Facility Information • Emergency Response Information • Hazard Evaluation • Discharge Scenarios (Response Planning Levels) • Discharge Detection Systems	• Plan Implementation • Self-Inspection, Drills/Exercises, and Response Training • Diagrams • Security Systems • Response Plan Cover Sheet

Where multiple federal and state response planning requirements apply, facilities are encouraged to develop a single, integrated response plan that encompasses related components. A brief description of the requirements for each FRP element, including approaches to streamline FRP preparation, are presented below.

Emergency Response Action Plan

The FRP must contain an Emergency Response Action Plan that provides procedures and

Facility Information

The Facility Information section is designed to provide an overview of the site and describe past activities at the facility. Much of the information required in this section may be obtained from the facility's SPCC Plan, if one has been prepared. The minimum required information parameters include the facility name and location, latitude and longitude, wellhead protecton area[1] information, owner or operator identification, name of the qualified individual(s) having full authority (including contracting authority), to implement removal actions; the date of oil-storage start-up; a brief description of current operations; and the date and type of any substantial expansion.

Emergency Response Information

The information provided in this section must describe what will be needed to address an actual emergency involving the discharge of oil or a combination of oil and hazardous substances. This information is used to assess the facility's ability to respond to a worst case discharge and instances where additional assistance may be needed. The Emergency Response Information section of the plan must include the following components:

Emergency Notification - provides emergency notification phone lists, spill response notification, incident description, response action, impact, caller notification, and additional information.

Response Equipment List - lists facility response equipment describing pumps, boom, communication equipment, fire fighting equipment, and additional information.

Response Equipment Testing/Deployment - identifies response equipment inspection frequency, and deployment frequency.

Personnel - contains lists identifying emergency response personnel, emergency response contractors, and the facility response team.

Evacuation Plans - provides a facility-wide evacuation plan which is displayed in a diagram.

Qualified Individual's Duties - describes the duties of the qualified individual(s).

Appendix F to 40 CFR Part 112 provides standard forms that can be used to help prepare required FRP emergency response information.

Hazard Evaluation

The Hazard Evaluation section of the FRP requires the facility owner or operator to examine the facility's operations and predict where potential discharges might possibly occur. Specific provisions include:

Hazard Identification - identifies tanks and surface impoundments, including information on the substance and quantity stored, tank type, year of installation/refrabrication, maximum capacity, and a record of any known failure and cause of the failure. This subsection also should identify risks from loading/unloading operations, day-to-day operations that may present a risk of discharging oil or releasing a hazardous substance, the secondary containment volume associated with each tank or transfer point at the facility, and the normal daily throughput for the facility, as well as any effect on potential discharge volumes that a change in that throughput may cause.

Vulnerability Analysis - addresses potential effects (i.e., to human health, property, or the environment) of an oil spill. An analysis must be prepared for each facility, appropriately, and must discuss the vulnerability of water intakes, schools, medical facilities, residential areas, businesses, wetlands or other sensitive environments, fish and wildlife, lakes and streams, endangered flora and fauna, recreational areas, transportation routes, utilities, and other areas of economic importance (e.g., beaches, marinas) including terrestrially sensitive environments, aquatic environments, and unique habitats.

Analysis of the Potential for an Oil Spill - analyzes the likelihood of a spill occurring at the facility. Factors to be considered in the spill potential analysis consist of oil spill history, horizontal range of a potential spill, vulnerability to natural disasters, and other relevant factors (e.g., tank age).

Facility Reportable Oil Spill History - describes the facility's reportable oil spill history.

Discharge Scenarios

The FRP also must describe the facility's potential worst case discharge, as well as potential small and medium sized spills. This section assists the multi-level planning process contained within the FRP. This section encompasses:

Small and Medium Discharges - addresses planning requirements and considerations for small and medium discharge scenarios

Discharge Detection Systems

The owner or operator must provide a detailed description of the procedures and equipment used to detect discharges. Required components of this section include:

Discharge Detection By Personnel - describes procedures and personnel that will detect any spill, uncontrolled discharge of oil, or release of hazardous substances.

Automated Discharge Detection - describes any automated spill detection equipment that the facility has in place.

Plan Implementation

In this section of the FRP, facility owners or operators must explain how the facility's emergency response plan will be executed, including a detailed description of response actions to be carried out under the plan. This section should consist of:

Response Resources for Small, Medium, and Worst Case Spills - identifies and demonstrates accessibility to the proper response personnel and equipment to respond effectively to all identified spill scenarios.

Disposal Plans - describes how and where the facility intends to recover, reuse, decontaminate, or dispose of spilled or released materials, including cleanup residues, contaminated equipment and clothing.

Containment and Drainage Planning - describes how to control and contain a spill through drainage. Information provided under 40 CFR 112.7(e) within an established SPCC plan can be used to support this requirement.

Self-Inspection, Drills/Exercises, and Response Training

Facilities subject to FRP provisions must develop programs for facility response training and for drills/exercises according to the requirements of 40 CFR 112.21. Specific areas to be addressed in this section include:

Facility Self-Inspection - identifies facility self-inspection requirements in a two step process that includes a checklist of items to inspect and a method of recording the actual inspection and findings. The self-inspection portion of the FRP should address tank inspections

Tabletop Exercise Logs. Formatted sample logs are presented in Appendix F to 40 CFR Part 112.

Response Training - describes the programs for facility response training. Documented personnel response training and discharge prevention meeting logs are to be included in the facility response plan or kept as an annex to the facility response plan.

Diagrams

The FRP must have a separate section that includes a Site Plan Diagram and a Site Drainage Plan Diagram.

Security

The FRP must describe the facility security that will be provided, including emergency cut-off locations, enclosures, guards and their duties, lighting, valve and pump locks, and pipeline connection caps. An existing SPCC Plan for the facility will contain similar information. Duplicate information may be photocopied and inserted into this section.

Response Plan Cover Sheet

The FRP must be accompanied by the Response Plan Cover Sheet, identified as attachment F-1 to Appendix F of 40 CFR Part 112. The three page form has been developed to be completed and submitted to the RA by the owner or operator who has to submit a facility response plan.